

# CHURCH & DWIGHT CO., INC.

Corporate Headquarters:  
Princeton South Corporate Center  
500 Charles Ewing Boulevard  
Ewing, New Jersey 08628  
Main Phone: (609) 806-1200

March 19, 2021

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814  
<https://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Comments on Proposed Amendments to the California Consumer Products Regulation; Board Agenda Item # 21-2-1

Dear Board Members:

Church and Dwight (C & D), a leading Consumer Packaged Goods Company, appreciates the opportunity to provide comments on the Initial Statement of Reason (ISOR) for the Consumer Products VOC Regulation.

Our comments are the following.

### **Dry Shampoo**

C & D worked with staff on the Dry Shampoo category. We appreciate the name change to the product category to more appropriately describe the product. In addition, the 55% VOC limit proposed for 1/1/2023 is technologically feasible as is the 50% VOC limit in 2027. C & D can support both these limits. As well the definition was modified slightly again to more appropriately describe the use of the product. Dry Shampoo remains in the hair until eventually washed out. Dry Shampoo is used to clean, refresh and add volume to the hair when shampooing with water is not available. C & D appreciates the staff's willingness to work with us on this category.

### **Innovative Product Exemption (IPE)**

C & D does not support the staff's IPE proposal on compressed gas. The provision as written is confusing and lacks clarity. In addition, there are certain limitations to compressed gas that make the compressed gas IPE difficult to formulate products with.

C & D does support the National Aerosol Association (NAA) IPE using Reactivity. We see the use of Reactivity as a more flexible way to formulate new products.

### **Conclusion**

C & D supports the proposal of the CARB staff on Dry Shampoo. Unfortunately, we cannot support staff's IPE proposal on Compressed Gases. C & D does respectfully request the board to instruct staff to include either the NAA IPE or another Reactivity based IPE. We thank the staff for all their work and willingness to work with us.

Thank you in advance for considering our comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-339-4539 or at [djraymond@me.com](mailto:djraymond@me.com)



Sincerely,



Jeffrey Shaul  
Director, Global Regulatory Affairs  
Church & Dwight Co., Inc.

Cc: [Ravi.Ramalingam@arb.ca.gov](mailto:Ravi.Ramalingam@arb.ca.gov)  
[joe.calavita@arb.ca.gov](mailto:joe.calavita@arb.ca.gov)  
[josh.berghouse@arb.ca.gov](mailto:josh.berghouse@arb.ca.gov)  
[david.edwards@arb.ca.gov](mailto:david.edwards@arb.ca.gov)  
[jose.gomez@arb.ca.gov](mailto:jose.gomez@arb.ca.gov)

